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Attorneys for Defendants
 AMERCO, AMERCO REAL ESTATE
 COMPANY, U-HAUL CO. OF
 CALIFORNIA, AND U-HAUL
 INTERNATIONAL, INC.

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

AMERICANS WITH DISABILITIES
 ADVOCATES, a Nevada Nonprofit
 Corporation, and GEORGE S. LOUIE,

Plaintiffs,

v.

AMERCO, AMERCO REAL ESTATE
 COMPANY, U-HAUL COMPANY OF
 CALIFORNIA, AND U-HAUL
 INTERNATIONAL, INC.,

Defendants.

Master Case No. C 03-1428 CW

**STIPULATION AND ORDER
 TO CONTINUE EXPERT
 DISCLOSURE AND EXPERT
 DISCOVERY COMPLETION
 DATES**

Plaintiffs Americans With Disabilities Advocates, a Nevada Nonprofit Corporation, and George S. Louie (collectively "Plaintiffs"), by and through their counsel of record, J. Grant Kennedy, and defendants Amerco, Amerco Real Estate Company, U-Haul Co. of California and U-Haul International, Inc. (collectively "Defendants"), by and through their counsel of record, James R. Evans, Jr., stipulate and agree as follows:

1 A. On April 7, 2004, Plaintiffs filed their First Amended Complaint
2 ("FAC") alleging ADA and State law violations based on permanent and
3 impermanent barriers to access at 16 different U-Haul facilities in Northern
4 California;

5 B. On August 19, 2005, the Court held a Case Management Conference
6 in which the Court ordered that expert identities and reports be disclosed by
7 October 14, 2005, and that expert discovery be completed by November 18, 2005.
8 At the Case Management Conference, Defendants informed the Court that
9 Defendants intended to file a motion for partial summary judgment on the ground
10 that allegations in the FAC, relating to permanent "architectural barriers", violated
11 the Court's March 18, 2004, order granting Defendants' motion to dismiss and
12 motion to enforce the settlement agreement in Richard v. Bayshore Moving Center,
13 et al., No. C-96-03881 CW (N.D. Cal.);

14 C. On August 25, 2005, Defendants filed their motion for partial
15 summary judgment which was scheduled to be heard on September 30, 2005;

16 D. On September 30, 2005, the Court issued its order granting in part and
17 denying in part Defendants' motion for partial summary judgment. The Court ruled
18 that Plaintiffs could not bring a claim for "architectural barriers to access" for their
19 ADA claim but could assert the allegation for their State law claims;

20 E. Until the resolution of Defendants' motion for partial summary
21 judgment, the parties were uncertain whether Plaintiffs' claims under the ADA for
22 permanent "architectural barriers to access" would be permitted to proceed in this
23 action. This, in turn, affected the potential scope of expert testimony and the expert
24 disclosures;

25 F. The Court's ruling on the motion for partial summary judgment, dated
26 September 30, 2005, impacted the expert witness disclosures because of the limited
27 scope of the issues remaining to be tried. As such, the parties desire to extend the
28

1 time for expert witness disclosures in order to permit the reports to address the
2 issues remaining to be tried;

3 G. Trial in this matter will not begin until December 11, 2006, and if an
4 extension is granted, briefly delaying completion of the expert disclosure and
5 discovery completion dates will not seriously impact the schedule of the case or
6 prejudice the parties in preparing for trial; and

7 H. The Court has not previously granted any extensions for the requested
8 extensions.

9 NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

10 1. The completion date for expert identity disclosure and disclosure of
11 expert reports is continued for 60 days from October 14, 2005, to December 13,
12 2005; and

13 2. The expert discovery completion date is continued from November 18,
14 2005, to January 17, 2006.

15 Dated: October 13, 2005

16
17 By James R. Evans (amc)
18 JAMES R. EVANS, JR.
19 Attorneys for Defendants AMERCO,
20 AMERCO REAL ESTATE
COMPANY, U-HAUL COMPANY OF
CALIFORNIA and U-HAUL
INTERNATIONAL, INC.

21 Dated: October __, 2005

22
23 By _____
24 J. GRANT KENNEDY
25 Attorneys for Plaintiffs AMERICANS
26 WITH DISABILITIES ADVOCATES
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19 Attorneys for Defendants AMERCO,
20 AMERCO REAL ESTATE
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24 Dated: October 13, 2005

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26 J. GRANT KENNEDY
27 Attorneys for Plaintiffs AMERICANS
28 WITH DISABILITIES ADVOCATES
and GEORGE S. LOUIE

ORDER

The completion date for expert identity disclosure and disclosure of expert reports is continued for 60 days from October 14, 2005, to December 13, 2005, ~~on~~ to _____; and the expert discovery completion date is continued from November 18, 2005, to January 17, 2006, ~~on to~~ _____.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 18, 2005

THE HON. CLAUDIA WILKEN
United States District Court Judge

